

01.06.2026

Website

Welcome to the hunam.hu website (hereinafter referred to as: the Website)! Thank you for visiting our Website!

HUNAM Personnel Solutions Kft. (HUNAM Personnel Solutions Llc.), as the data controller, provides information through this Information Note on Data Management (hereinafter referred to as: the "Information Note") regarding the services provided via the Website and other data management activities it carries out.

When you use our services, you provide us with information that constitutes personal data. Your personal data will be processed solely in accordance with the purpose of the data management, to the extent, in the manner, and for the duration necessary to achieve that purpose, in compliance with legal requirements – with particular regard to Regulation (EU) No. 2016/679 of the European Parliament and of the Council (27 April 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (hereinafter referred to as: the General Data Protection Regulation (GDPR)). In order to ensure data security, we maintain a high standard of necessary data security, technical, and organizational measures.

For details regarding data management, please read the Information Note below.

If you have any further questions regarding the information contained in this Information Note or the management of your personal data that you have already provided, please feel free to contact us at any time using one of the contact details below.

I. THE DATA CONTROLLER

With regard to the data management described in this information note, the controller of personal data is:

HUNAM Personnel Solutions Kft.

Registered office: H-1118 Budapest, Villányi út 91.

Company registration number: 01-09-992573

Court of registration: Court of Registration of the Metropolitan Tribunal Court of Budapest

Tax number: 13219576-2-43

(hereinafter referred to as: "HUNAM Personnel Solutions Kft.")

Our contact details in issues related to data management:

Postal mailing address: H-1118 Budapest, Villányi út 91.

E-mail account: adatvedelem@hunam.hu

Telephone: +36 1 372 0692

Website: www.hunam.hu

Electronic availability of the Information Note on Data Management: www.hunam.hu

Data Protection Officer: Beáta Torma

Postal mailing address: H-9027 Győr Budai u. 5/a.

E-mail account: adatvedelem@hunam.hu

Telephone: +36 96 508 000

If you have any questions about the data management covered by the scope of this information note, please contact us at the central contact details specified above.

II. OUR DATA MANAGEMENT PRACTICES DETAILED IN A SEPARATE INFORMATION NOTE

1. Our management of data related to job advertising, job placement and career counselling, recruitment

HUNAM Personnel Solutions Kft., inter alia, carries out workforce mediation and recruitment services for its clients. If you apply for one of our job advertisements or register in our jobseeker database, we will manage the personal data that we obtain about you in the process. Details of the data management for this purpose are summarized in a separate information note.

III. DATA MANAGEMENT UNDER THIS INFORMATION NOTE

1. Contract conclusion and contract performance

This Article applies to contracts entered into in the course of our business activities, i.e. contracts we enter into with our clients, subcontractors, business partners, and suppliers. Employment contracts are not covered by this Article.

What is the purpose of data management?

In relation to contracts, personal data are managed primarily when our contracting partner (whether on the client or supplier side) is a natural person or a self-employed sole trader. The purpose of managing the personal data of these persons is the establishment, registration and performance of the contract.

Personal data of persons acting as contact persons may also be managed in connection with contracts. If our contracting partner is a company, a contact person will normally act as their contact person, but in the case of an individual or self-employed sole trader contracting partner, another person may also act as their contact person. The purpose of managing the personal data of the contact persons is the smooth creation, performance and termination of the contract.

If the contract is subject to an obligation to issue an invoice and our contracting partner is a natural person or a self-employed sole trader, the data relating to the invoice issued on the basis of the contract, the purpose of the management of which is to fulfil our accounting obligations as defined by the law (issuance and retention of invoices) also qualify as personal data.

In the case of a natural person or a contracting party who is a self-employed sole trader, the purposes of data management in the context of the performance of the contract also include the settlement of any warranty and guarantee claims and other legal disputes.

What personal data do we manage for the above purposes?

In the case of natural person and self-employed sole trader contracting parties:

name, identification data, quantity and price of the service requested;

date, time and status of order and conclusion of the contract;

data relating to the performance of the subject matter of the contract (place and time of performance, certificate of completion);

invoice details (name and address of the contracting party, ordinal number and date of issue of the invoice, date of performance, payment deadline, gross and net amount, VAT amount, discounts and legal titles, etc.);

payment details (date of payment, amount, method of payment, bank account number of the contracting partner in case of bank transfer);

reported warranty and guarantee claims, the content of the report recorded on the claim, the method and date of fulfilment of the claim.

In the case when the contact person is acting:

the contact person's identification data and contact details (first name, last name, telephone number, e-mail address, position, name of the company/person represented);

On what legal basis and for how long do we manage these personal data?

When entering into a contract with a natural person or a self-employed sole trader, we need their personal data necessary for the conclusion and performance of the contract, and their personal data necessary depending on the subject matter of the contract, therefore the provision of these data is a prerequisite for the conclusion of the contract. The legal basis for the management of these data is **the performance of the contract** pursuant to Article 6(1)(b) of the GDPR. Basically, these data are managed in accordance with Article 78 (3) and (4) of Act CL of 2017 on the Rules of Taxation (Art.) during the limitation period of the right to tax assessment specified in Article 202 of the Art. (5 years after the year of the tax return), and are deleted after the expiry of the limitation period without a specific request.

In addition, in the case of a natural person or a self-employed sole trader, certain personal data **are managed on the basis of the following legal obligation** (Article 6(1)(c) of the GDPR):

in the event of an obligation to issue or retain an invoice, we must manage the invoicing data (invoicing name and address, invoice details) in accordance with Act C of 2000 on Accounting (Sztv.) and we are obliged to retain the documents issued in connection with the contract, together with the data contained therein, for 8 years in accordance with Section 169 of the Act on Accounting;

if our client is subject to VAT, we are obliged to indicate the tax number of the customer or service user on the invoice pursuant to Section 169 (d) (dc) of Act CXXVII of 2007 on Value Added Tax (hereinafter referred to as: the VAT Act). The retention period of the tax number is aligned with the retention period of the invoice.

We process the contact person's details in accordance with Article 6(1)(f) of the GDPR **for our legitimate interest in the smooth performance of the contract**, during the performance of the contract and the limitation period (5 years) of the related claims. In the event of a change of contact person, the data of the previous contact person will be deleted at the same time as the change is transferred.

2. Customer service data management, contacting

What is the purpose of data management?

If you contact us with a query (contacting us), we will manage the personal data you have provided to us in a message, e-mail, postal letter or telephone call in order to contact you and respond to your query.

This Article also covers requests for information. Where the correspondence relates to the preparation of a contract or to an ongoing or completed contract, the details of that type of data management will apply to that contact.

What personal data do we manage for the above purpose?

If you contact us by e-mail:

name, e-mail address, other personal data provided by the enquirer (including, in particular, the contact details of the enquirer or other data subject and the circumstances of the matter with which the enquirer has contacted us)

If you contact us by phone, we will manage the following data: name, telephone number, date and time of the conversation, personal data provided by the enquirer (including, in particular, the contact details of the enquirer or other person concerned and the circumstances of the matter with which the enquirer has contacted the customer service)

In the case of a letter sent by post: name and address of the sender, date of delivery of the letter, other personal data provided by the enquirer (including, in particular, the contact details of the enquirer or other data subject and the circumstances of the matter with which the enquirer has contacted us).

On what legal basis do we manage these personal data?

We manage the personal data of the data subjects processed in accordance with this Article for the purposes of our legitimate interest in recording and responding to the data subject's request and settling the resulting claims, pursuant to Article 6(1)(f) of the GDPR.

How long do we keep your personal data?

Personal data managed in connection with enquiries (including also e-mails) will be deleted after the purpose for which they were managed ceases to exist. Thus, if the e-mail and the response to it are not expected to be needed for further administration or claims, they will be deleted immediately, otherwise the request and the response will be deleted after they are no longer needed for these purposes.

3. Management of cookies

What do we mean by a cookie and what is its purpose?

This website uses cookies. A cookie is a file (small data packet consisting of letters and numbers) that is placed on your computer device (computer, smartphone, tablet, etc.) used when you visit the site. This allows the website to recognise the user's browser in order to determine, for example, whether or not the user has visited the website before.

The cookie itself does not contain or collect information, it is only used to help identify users. This will help to provide them with a more convenient, user-friendly service.

The primary purpose of the cookies is to enable the website to function properly, in particular by tracking the data that is collected about visits to the website and to detect possible abuse of the website.

In principle, the data collected by the cookies cannot be used to identify the user, and this data will only be linked to other potentially identifiable data if the user explicitly consents to the use of identifiable cookies in relation to him or her.

Cookies are stored in the browser's memory and typically include the following:

The name of the sending server

The lifetime of the cookie

The value – usually a randomly generated unique number

The server of the website that sends the cookie uses this number to identify the user when they return or move from page to page. Only the sending server can read and use this value. Cookies play a central role in the customisability of the Internet and behavioural advertising is usually cookie-based.

How can you delete or disable cookies?

You can also delete cookies from your own device or set your browser to block cookies. It is also possible to disable all cookies, but this will significantly degrade your web browsing experience if you use services that use cookies.

You can find the cookie settings for different browsers here:

Browser	Cookie setting (link)
Chrome	https://support.google.com/chrome/answer/95647?hl=en
Firefox	https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer
Safari	https://support.apple.com/kb/PH5042?locale=en_US
Microsoft Edge	https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy
Internet Explorer	https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies

What cookies do we use and what do they serve for?

Cookie name	What data the cookie has access to	Lifetime	Function (Why is it necessary for the Website or for users)
Session cookies		the given work session	These are temporary cookies that are stored only for the duration of your current visit and are deleted from your computer when your session ends. They are essential for navigating the website and ensuring its proper functioning. Session cookies do not, under any circumstances, collect information about you that could be used to identify you.

We also use the services of Google Analytics in connection with the Website. Cookies managed by Google Analytics help us to measure website traffic and other web analytics data. The information collected by cookies is transferred to and stored on external servers operated by Google. Google will use this information primarily for the purpose of tracking the number of visits to the website and analysing website activity for our benefit. Google is authorised to transfer this information to third parties where required to do so by the law. Google may also transfer this data to third parties that it uses to process the data. Google Analytics can provide detailed information on the management of data by Google Analytics (<http://www.google.com/analytics>).

Our ads are displayed on websites of external service providers (Google, Facebook). These third-party service providers (Google, Facebook) use cookies to store the fact that the user has already visited the Website before and, based on this information, display ads to the user in a personalised way (i.e. remarketing).

You can opt out of Google's use of cookies by going to Ads Settings (for more information, see <http://www.google.hu/policies/privacy/ads/>). Users can also disable cookies from external service providers on the unsubscribe page of the Network Advertising Initiative (<http://www.networkadvertising.org/choices/>).

The management of data by the aforementioned external service providers is governed by the data protection standards set by these service providers, and we do not assume any responsibility for such data management.

IV. WHO CAN ACCESS YOUR PERSONAL INFORMATION?

Your personal information will be kept strictly confidential. The personal data we process may be accessed by our employees who need to know it in order to perform their job duties, furthermore, by

our data processors and their employees in connection with the tasks they perform. These persons are also required to treat the personal data they receive as confidential.

Our data processor partners and their tasks:

The data processor	The activity performed by the data processor in relation to data management
SMIDEK Kft. (SMIDEK Llc.) Registered office: H-9028 Győr, Pattantyús u. 4/a. tetőtér 2.	Activity: SMS service, SMS server operation
Iron Mountain Magyarország Kft. (Iron Mountain Hungary Llc.) Registered office: H-1093 Budapest, Czuczor utca 10. IV. and V. Contact: www.ironmountain.hu	Activity: document shredding

We reserve the right to involve additional data processors in the future, which we will inform you of by amending this Information note.

We will disclose your personal data to **courts, prosecutors, other authorities** in the context of our legal obligations, to the extent and in the manner provided for in the regulations.

In the event of **enforcement of a legal claim** against you, your personal data may also be disclosed to the extent necessary for the enforcement of the claim by our respective legal cooperation partners and our claims management partners.

Our company engages an auditor; the auditing firm and its employees are also authorized to inspect our company's records and to make and handle copies as necessary for the audit. Our auditor is Pannónia Könyvvizsgáló Korlátolt Felelősségű Társaság (Pannónia Auditing Limited Liability Company; H-9027 Győr, Budai utca 5/a.).

V. DATA SECURITY

We are committed to taking the necessary data security measures. Within the framework of this, we adopt and develop, regularly review, technical and organisational measures and procedural rules to ensure the security of the personal data we manage, and we will do our utmost to prevent the destruction, unauthorised use or alteration of the data, to ensure that the personal data we manage cannot be accessed, disclosed, transmitted, modified or deleted by unauthorised persons. We remind all those to whom we transfer personal data to comply with data security requirements.

In the context of the above, information technology solutions are designed and chosen to ensure that those who have access to the data have exclusive access to the data and that the data remain authentic

and unaltered. This includes, inter alia, password-protected access systems, activity logging and regular backups.

We keep abreast of technological developments, the available technical, technological and organisational solutions, and apply solutions that are appropriate to the level of protection justified by our data management operations.

VI. HANDLING OF PRIVACY INCIDENTS

A privacy incident is any incident whereby personal data is accessed by an unauthorised person or is destroyed, lost or altered, for example, if the database is destroyed or the storage medium on which the data is stored is lost.

In the event of a privacy incident, we assess the impact and risks (what data is affected, how much, whether or not it can be recovered, etc.) and take the necessary steps to remedy the situation without delay. If we are unable to address the risks, we will report the incident to the data protection authority within 72 hours of becoming aware of the incident and we will publish information about the incident on our website. We also keep records of privacy incidents with details required by the law.

VII. YOUR RIGHTS

WITHDRAWAL OF THE CONSENT: If the legal basis for the data management is your consent, you have the right to withdraw your consent at any time without giving any reason. After withdrawal of consent, the personal data of the data subject will no longer be managed and will be deleted. Withdrawal of consent does not affect the lawfulness of the prior data management.

RIGHT OF ACCESS: You can use the contact details provided in Article I at any time to ask us whether we are managing your personal data and, if so, to provide you with further information about the following:

the purposes and legal basis of the data management, your personal data we process, the categories of personal data we process, the recipients or categories of recipients (including also data processors we use) to whom or which we have disclosed or will disclose the personal data (in case of transfers to third countries, the safeguards to ensure adequate protection of the data), the legal basis for the data transmission, the storage period, the data subject's right to obtain from the data controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data, the right to lodge a complaint with the National Data Protection and Information Authority (NAIH), the source of the data, the circumstances of the possible data breach, its effects and the measures taken to remedy it.

We will also provide you with a copy of the personal data we hold about you together with the provision of information. The first copy is free of charge, but for each additional copy we are authorised to charge a reasonable fee based on our administrative costs. The amount will be communicated to you in advance.

RIGHT TO RECTIFY OR SUPPLEMENT: If you become aware that any of your personal information is registered in an incorrect, inaccurate or incomplete way, please provide us with the correct or additional information as soon as possible, so that we can carry out the correction or completion.

RIGHT OF ERASURE (RIGHT TO BE FORGOTTEN): You have the right to request the deletion of your personal data. Please note that we may refuse to delete data, in particular if we need or may need the data to comply with a legal obligation or to enforce a claim.

In the case of data management based on legitimate interest, an objection to the data management shall also entail the deletion of the data, unless there are overriding reasons why the deletion cannot be complied with.

Deletion may also be possible, if:

- a) the data are no longer necessary for the original purpose of the data management;
- b) the data management is unlawful;
- c) we are required to delete data by European Union or national law.

THE RIGHT TO RESTRICT DATA MANAGEMENT: In the course of the data management, you may request the restriction of data management, if: (i) you contest the accuracy of the personal data – in this case, the restriction shall be valid for a period enabling us to verify the accuracy of the personal data; (ii) the processing is unlawful, but you object to the deletion of the personal data and request the restriction of their use instead; (iii) we no longer need the personal data for the purposes of the data management, but they are required by you for the submission, enforcement or protection of legal claims; or (iv) you have objected to data management based on our legitimate interests; in this case, the restriction applies for the period until it is determined whether the legitimate grounds prevail over your legitimate grounds.

In the case of restriction, we will only store the data and will not perform any other operations on it, unless you consent to further processing or unless such further processing is necessary to protect your own rights, the rights of a third party or is in the public interest.

In case of restriction of data management, you will be informed in advance of any release of the restriction.

THE RIGHT TO OBJECT: In relation to data management based on our or a third party's legitimate interests, you may object to our data management if you consider that the data management is prejudicial to you.

In the event of an objection, personal data will be deleted unless there is an overriding reason to keep it. Such an overriding reason may be if we wish to pursue a claim against you.

RIGHT TO DATA PORTABILITY: In case the data management is carried out by automated (i.e. electronic) means on the basis of your consent or on the legal basis of the performance of a contract (e.g. an employment contract), you may request that the personal data we have about you is provided to you or a person you designate in a commonly known and easily usable electronic format.

VIII. SUBMITTING AND RESPONDING TO REQUESTS

If you wish to exercise any of the rights set out above, please send us your request in writing, if possible, to one of the contact details set out in Paragraph I. In the letter, please include your identification details and postal address, too. If we have any doubt about your identity or if the information you provide is not sufficient to identify you, we are authorized to ask you for additional identification information.

Your request will be fulfilled within 1 month. In case of need, we are authorized to extend this period by a further 2 months, and we will send you a reasoned explanation thereof.

Well-founded requests will be fulfilled free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, we are authorized to charge a reasonable fee or even refuse to act on the basis of the request.

We will inform all those to whom we have disclosed the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. At your request, we will inform you of the recipients to whom we have provided the information described above.

IX. COMPENSATION FOR DAMAGES AND GRIEVANCE FEE

If we cause damage to you or another person by unlawful or unsecure management of your personal data, you or the person who has suffered damage may enforce his or her claim for damages against us. And, if we infringe your privacy rights in this way, you are authorized to enforce a claim for a grievance fee.

Please note that we will not be liable to pay compensation or a grievance fee if the damage can be proven to have been caused by an unavoidable external cause outside the scope of data management, or if the damage is the result of your intentional or grossly negligent conduct.

X. HOW TO ENFORCE A CLAIM

1. Contacting the data controller

If you believe that we are not acting lawfully in managing your personal data, please first contact us as the data controller with your comment or claim at one of the contact details indicated in Article 1 in order to enable us to process and handle your comments as quickly and efficiently as possible.

Please note that you can also contact the Data Protection Officer, who is the following person in the case of the Pannon-Work group of companies: E-mail address of Beáta Torma: adatvedelem@pannonwork.hu.

2. Turning to a court

Please note that you are also authorized to pursue your claim in court. The tribunal courts have jurisdiction to hear the case. You can also bring the case before the courts where we are based or where you live or reside.

3. Contacting the authority for data protection, making a complaint

In the event of unlawful data management, you are also authorized to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings.

Website: <http://naih.hu>

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Postal address: H-1365 Budapest, P. O. Box: 9.

Budapest, 01.06.2026

HUNAM Personnel Solutions Kft.

Data Controller